

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

SAMUEL LIT,

Plaintiff,

v.

INTERCONTINENTAL HOTELS
GROUP RESOURCES, INC.

Defendant.

Case No. 1:16-cv-_____

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Samuel Lit brings this patent-infringement action against Intercontinental Hotels Group Resources, Inc. (hereinafter, "IHG").

Parties

1. Lit is an individual residing in Penn Valley, Pennsylvania.
2. IHG is a Georgia corporation with its principal place of business in Atlanta, Georgia.

Jurisdiction and Venue

3. This action arises under the patent laws of the United States, 35 U.S.C. §§ 101 *et seq.*
4. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).
5. This Court may exercise personal jurisdiction over IHG. This is because IHG conducts continuous and systematic business in Illinois and this District. For example, IHG sells services to consumers in this District. This patent-infringement claim arises directly from IHG's continuous and systematic activity in this District. In short, this Court's exercise of jurisdiction

over IHG would be consistent with the Illinois long-arm statute, 735 ILCS § 5/2-209, and traditional notions of fair play and substantial justice.

6. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2).

Infringement of U.S. Patent No. 8,793,330

7. Lit is the exclusive owner of U.S. Patent 8,793,330 (the “330 patent”), which is attached as Exhibit A.

8. The ‘330 patent is valid and enforceable.

9. IHG has and is directly infringing some or all of the 20 claims of the ‘330 patent. For example, and to illustrate one of the claims that IHG infringes, IHG infringes claim 16 as follows:

- a. Claim 16 is a “system for displaying content” with “a display carousel embedded into a website” with “one or more display windows configured to display said content and to revolve at a predetermined rate of speed” (Ex. A (‘330 patent), col. 10:62-11:2.) IHG sells services through the website www.IHG.com. That site includes a display carousel embedded in the site and contains five display windows configured to display content and revolve at a predetermined rate of speed. For example, as of November 28, 2016, the site contained the following five windows that displayed content at a predetermined rate of speed: (i) “Introducing your rate”; (ii) “Seize the mug”; (iii) “Get some zzzleep”; (iv) Wiiiiiiiiiii-Fi; and (v) “Was staying here a smart move? Or was it genius?”
- b. Claim 16 includes “a display engine configured to deliver said content to said display windows of said display carousel when said website or webpage is

displayed on a web browser, wherein said display engine is in communication with said website or webpage and a server of said system.” (Ex. A (‘330 patent), col. 11:3-7.) A display engine communicates with the IHG site and a server, thereby powering the IHG display carousel described above.

- c. Claim 16 includes “a database comprising storage and retrieval functionality for statistical and financial information about said content displayed on said display carousel, wherein said database is in communication with said server” (Ex. A (‘330 patent), col. 11:8-11.) IHG uses a database to track how many customers view and purchase the content displayed on the display carousel.
- d. In claim 16, the displayed content “is instantly passed between said display engine and said display carousel . . . [.]” (Ex. A (‘330 patent), col. 11:12-13), as is done on www.IHG.com when the display engine powers the display carousel.

Prayer for Relief

WHEREFORE, Lit prays for the following relief against IHG:

- (a) Judgment that IHG has directly infringed claims of the ‘330 patent;
- (b) For a reasonable royalty;
- (c) For pre-judgment interest and post-judgment interest at the maximum rate allowed by law;
- (d) For such other and further relief as the Court may deem just and proper.

Demand for Jury Trial

Lit demands a trial by jury on all matters and issues triable by jury.

Date: December 5, 2016

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